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UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Competitive Product Prices Priority Mail Contract 105 (MC2015-20) Negotiated Service Agreement Docket No. CP2015-25

PUBLIC REPRESENTATIVE COMMENTS ON POSTAL SERVICE NOTICE OF AMENDMENT TO PRIORITY MAIL CONTRACT 105

(May 29, 2015)

The Public Representative hereby provides comments pursuant to Order No. 2498.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of an Amendment to Priority Mail Contract 105.² Attachment A to the Notice consists of a redacted (public) version of the Amendment. Notice at 1. An unredacted version of the Amendment is filed under seal.

In Order No. 2317, the Commission approved the Postal Service's request to add a new product identified as Priority Mail Contract 105 to the Competitive product list.³ Contract 105 became effective on January 8, 2015, one business day after the Commission issued Order No. 2317, and has a term of 3 years.⁴

The Amendment revises Section I.B. of Contract 105 to provide an additional Priority Mail packaging option to the contract customer for consumer purchase. The

¹ Order No. 2498, Notice and Order Concerning Amendment to a Priority Mail Negotiated Service Agreement, May 22, 2015.

² Notice of United States Postal Service of Amendment to Priority Mail Contract 105, with Portions Filed Under Seal, May 21, 2015 (Notice).

³ See Order No. 2317, Order Adding Priority Mail Contract 105 to the Competitive Product List, Docket Nos. MC2015-20/CP2015-25, January 7, 2015.

⁴ Docket Nos. MC2015-20/CP2015-25, Request of the United States Postal Service to Add Priority Mail Contract 105 to Competitive Product List and Notice of Filing (Under Seal) of Unredacted Governors' Decision, Contract, and Supporting Data, December 18, 2015, Attachment B at 2.

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Amendment will take effect one business day following the day on which Commission completes its regulatory review of this filing. Notice at 1.

The Postal Service asserts that the Amendment will not materially affect the cost coverage of Contract 105. *Id.* The Postal Service adds that as a result, the supporting financial documentation and certification previously filed in Docket Nos. MC2015-20/CP2015-25 on December 18, 2014, remains applicable. *Id.*

COMMENTS

The Public Representative has reviewed Priority Mail Contract 105 and the Postal Service's Amendment thereto. Based upon that review, the Public Representative recommends Commission approval of the Amendment to Contract 105.

The Postal Service's assessment that the Amendment will not materially affect the cost coverage of Contract 105 is not unreasonable. As filed, the Amendment does not change any of the negotiated rates for Contract 105, nor does it change the inputs used to calculate costs. As a result, there is likely to be little if any change in costs, or a material effect on cost coverage, arising from offering an additional Priority Mail packaging option to the contract customer for consumer purchase.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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Public Representative

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